

EXHIBIT A

Buckheit, Zach

From: Schaefer, Jesse
Sent: Wednesday, December 11, 2024 3:23 PM
To: Ryan Stevens
Subject: Notice of Rule 11 Violation

Mr. Stevens,

I am in receipt of the six motions you filed on December 4, 2024, in connection with your duplicative, frivolous, and meritless complaints in cases numbered 1-24-cv-00235-MR-WCM and 1-24-cv-00225-MR-WCM. Each of the six motions you filed, and the duplicative complaints at issue in each action, are in violation of Federal Rule of Civil Procedure 11. They have been filed for an improper purpose and the legal contentions in those motions and complaints are frivolous and not warranted by the applicable facts and law.

Pursuant to Federal Rule of Civil Procedure 11, this email is Defendants' formal notice to you of the above referenced violations of Rule 11. This email also constitutes Defendants' formal demand that you voluntarily dismiss your meritless complaints in the cases numbered 1-24-cv-00235-MR-WCM and 1-24-cv-00225-MR-WCM on or before January 2, 2025. Should you fail or refuse to do so, Defendants intend to seek monetary damages and other sanctions against you, including but not limited to the reimbursement of their attorneys' fees and the entry of a gatekeeper order, for your continued frivolous and meritless filings.

Regards,

Jesse

Jesse Schaefer
Partner
Womble Bond Dickinson (US) LLP

d: 919-755-8182
e: Jesse.Schaefer@wbd-us.com

555 Fayetteville Street
Suite 1100
Raleigh, NC 27601



womblebonddickinson.com

